

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re Anthony Guerrero

Debtor(s)

Case No. 20-10231
Chapter 13

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S) - AMENDED

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept	\$ <u>4,000.00</u>
Prior to the filing of this statement I have received	\$ <u>1,550.00</u>
Balance Due	\$ <u>2,450.00</u>

2. \$ 0.00 of the filing fee has been paid.

3. The source of the compensation paid to me was:

Debtor Other (specify):

4. The source of compensation to be paid to me is:

Debtor Other (specify):

5. I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.

6. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:

- a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
- b. Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
- c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
- d. [Other provisions as needed]

All services, except those identified in paragraph 7 below, that are reasonably contemplated to achieve the debtor's bankruptcy objectives including but not limited to:

- (1) File the certificate required from the individual debtor from an approved nonprofit budget and credit counseling agency for prepetition credit counseling;
- (2) Preparation and filing of all locally required forms;
- (3) Representation of the debtor at the § 341 meeting;
- (4) Amend any list, schedule, statement, and/or other document required to be filed with the petition as may be necessary or appropriate;
- (5) Prepare and file any motion as may be necessary or appropriate including but not limited to a motion to avoid a lien on exempt property, to obtain credit, to sell or abandon property, and to assume or reject a lease;
- (6) Attend confirmation hearings;
- (7) Negotiate valuation of secured claims and/or present evidence thereon at confirmation hearing;
- (8) Compile and forward to the trustee and the United States trustee any documents and information requested;
- (9) Removal of garnishments or wage assignments;
- (10) Negotiate, prepare and file reaffirmation agreements;
- (11) Consult with the debtor and if there is a valid defense or explanation, respond to a motion for relief from the automatic stay;
- (12) File the debtor's certification of completion of instructional course concerning financial management (Official Form 423);
- (13) Timely review all filed proofs of claim, and object to and file proofs of claim as appropriate;
- (14) Oversee the filing of all operating reports in chapter 13 and any required in chapter 13;
- (15) Represent the debtor in connection with motions for dismissal or conversion; and
- (16) Disclose any agreement and fee arrangement regarding the potential retention of co-counsel.

7. By agreement with the debtor(s), the above-disclosed fee does not include the following service:

Notwithstanding any agreement to the contrary, supplemental fees may only be awarded by the court if, after performing a review of Firm's detailed accounting, the court determines that additional fees are warranted. The

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(Continuation Sheet)

court may be more likely to award additional fees for extraordinary additional work such as Firm's work on dischargeability actions, adversary proceedings and heavily litigated matters that are not listed in Paragraph 6 above. Client may contest any fee that Firm petitions the Court to award.

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

October 30, 2020
Date

/s/ Michael McCrystal
Michael McCrystal 55064
Signature of Attorney
Upright Law LLC
151 Main Street, Suite A
Emmaus, PA 18049
610-262-7873 Fax: 610-262-2219
mccrystallaw@gmail.com
Name of law firm